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Attorney for Defendant PAUL LEUNG

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	CR 07-0428 MMC
	)	
Plaintiff,	)	MOTION FOR TRAVEL ORDER
	)	
vs.	)	
	)	Date: August 14, 2007
CARMEN CHAN and PAUL LEUNG,	)	Time: 9:30 a.m.
	)	Magistrate James Larson
Defendants.	)	
_____	)	

At the initial setting of the bond and Conditions of Pretrial Release in this matter, defendants PAUL LEUNG and CARMEN CHAN requested that they be permitted to travel internationally for business, family and pleasure as a condition of their release. Magistrate James Larson requested that a stipulation be prepared setting forth the prospective travel dates be submitted to the court for approval. Defendants submitted the proposed travel itineraries set forth below to AUSA Denise Barton and the government objects to defendant Carman Chan proposed travel request.

Defendants PAUL LEUNG and CARMEN CHAN, husband and wife, seek court approval to travel to the locations listed below on the following dates:

1 Hong Kong from August 21, 2007 to September 4, 2007

2 Hong Kong from October 2, 2007 to October 18, 2007

3 Hong Kong from November 13, 2007 to November 30, 2007

4 Japan from December 10, 2007 to December 18, 2007

5 Hong Kong December 29, 2007 to January 21, 2008.

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7 DATED: August 9, 2007

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9 Garrick Lew  
Counsel for Carmen Chan  
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